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12 April 1995

Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Dear Secretary,

The enclosed comments are my formal submission for  
your consideration of Rule Making, RM-8626.

Respectfully,

  
Raymond L. Miller  
1817 E. Ash  
Enid, OK 73701-2605

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Before The  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

In the matter of:

The petition to eliminate  
one way transmissions below  
30 MHz in the Amateur Radio  
Service frequencies.

RM-8626

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INTEREST and EXPERIENCE:

Public service and welfare is my primary interest. My forty five (45) years of experience is and has been devoted to that interest through the Amateur Radio Service.

The bulletin information, disseminated by the American Radio Relay League Radio Station W1AW, is a vital source of pertinent information during National and International emergency communications.

As Amateur Radio Licensee, W5REC, I find that service vital for my interest to serve the public. Therefore, it is my position to find the petition, in its' entirety, to be objectionable for the following reasons:

TRAINING:

The Amateur Radio Service is a National Resource. To that end, a continual need exists for preparing interested persons, **WITHOUT** financial personal cost, to become a licensed radio operator. The one way transmission of Morse Code, at various speeds, is a necessary training.

INFORMATION:

Bulletin transmissions are absolutely necessary to apprise public service amateur operators the location of the emergency/disaster and the frequency/ies where emergency and/or welfare messages are being communicated for the needs of the public. When the FCC approves a "quiet zone", the bulletin station provides nation-wide information to reduce interfering operations to the emergency/welfare designated frequency/ies.

The expediency of information is a necessary requirement by the Amateur Service. This fact is achieved by the one way transmission of bulletins. This service is enhanced through the American Radio Relay League Field Organization. There are multiple Section Communication Networks throughout the United States and Canada. Most of these have an Official Bulletin Station, appointed by their Section Manager, whose duties are to retransmit the applicable bulletin.

SPECIFIC OBJECTIONS and OPINIONS:

In a democracy, there is always those having the view that their personal agenda is more important than the good of the whole. Unfortunately, some agree with those whose anger is expressed. It is my strong opinion that many have no idea of the meaning of "Basis and purpose" FCC Rule 97.1 (a).

Relegation of one way transmissions to the amateur spectrum above 30 MHz would cripple the effectiveness of widespread vital information. The reason for this fact is that most public service activities, with long range propagation capability, operate in Networks below 30 MHz.

Telephone systems can be totally inoperative in a widespread disaster. Other commercial communication systems are still vulnerable to the extent that the Amateur Radio Service capabilities, below 30 MHz, are still the recognized National Resource as an adjunct to communications.

CONCLUSION:


Analysis of FCC Rule 97.3(23) versus 97.111(e), when considering the word "emanating", does pose a dilemma to the narrow mind. It is my belief that, in the context of application, there is no problem with the FCC Rules on this matter.

Consideration of safeguards brings one, naturally, to restrictive operation such as the approval, by NASA for their Space Centers to use one way transmission of shuttle space activity. This is excellent, within the Agency's prerogative, and the FCC is commended to have certified that amateur activity. I firmly believe that FCC Rule 97.101(a) is adequate safeguard to relieve interference. "In all respects not specifically

covered by FCC Rules---", it is my responsibility and obligation to read, know and observe the published frequencies, times and dates of bulletin stations and section communications net activities. Upon that knowledge, practicing "good amateur practices", I will not operate my station to interfere.

ARRL Headquarters Radio Station, W1AW, has, for decades, been the most effective tool for public service amateur radio operator needs as well as general information for the welfare of the Amateur Service. This tool, by the use of the Field Organization, is superb.

The words, to express my objection to the RM-8626, is the use of the old addage; "DON'T THROUGH THE BABY OUT WITH THE BATH WATER"!!!

  
Raymond L. Miller, W5REC  
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DATE: 12 Apr 1995